IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
		CRIMINAL NO
V.	:	
		DATE FILED:
SUSANTA TEDJO	:	
		VIOLATION:
	:	18 U.S.C. § 1960(a) (operating an

INDICTMENT

unlicensed money transmitting

business - 1 count)
Notice of forfeiture

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

- 1. Defendant SUSANTA TEDJO conducted and directed an unlicensed money transmitting business from a store she operated called Srikandi Market ("Srikandi"), located at 2100 South 9th Street, Philadelphia, Pennsylvania. Defendant SUSANTA TEDJO collected money from customers who wanted their funds wired to Indonesia. The defendant charged her customers fees in excess of \$17,500 to conduct these financial transactions.
- 2. Commerce Bank was a federally insured financial institution, certificate number 22178, with offices located in the Eastern District of Pennsylvania. Defendant SUSANTA TEDJO had a personal account at Commerce Bank which she used to wire funds for her customers to Indonesia.

- 3. HSBC Bank was a federally insured financial institution, certificate number 57890, with offices located in the Eastern District of Pennsylvania and Indonesia. Defendant SUSANTA TEDJO'S son D.T. had an account at HSBC Bank in Indonesia which defendant SUSANTA TEDJO used to wire funds for her customers to Indonesia.
- 4. Defendant SUSANTA TEDJO accepted cash from her customers, which she deposited into her Commerce bank account. Defendant SUSANTA TEDJO subsequently transmitted these funds from Philadelphia, Pennsylvania to D.T.'s HSBC bank account in Indonesia, for later distribution to individuals designated by her customers.
- 5. The Commonwealth of Pennsylvania, pursuant to Pennsylvania Consolidated Statutes, Chapter 7, Section 6102, required a person who engaged in the business of transmitting money for a fee in the Commonwealth of Pennsylvania to obtain a license from the Pennsylvania Department of Banking, and the operation of a money transmittal business without such a license was punishable under Pennsylvania Consolidated Statutes, Chapter 7, Section 6116.
- 6. At no time relevant to this indictment did defendant SUSANTA TEDJO or Srikandi obtain or possess a license or authorization from the Pennsylvania Department of Banking to conduct, manage, or otherwise direct a money transmitting business in the Commonwealth of Pennsylvania.
- 7. At no time relevant to this indictment was defendant SUSANTA TEDJO or Srikandi registered with the United States Secretary of the Treasury as a money transmitting business.
 - 8. From in or about January 2003 through in or about June 2004, in

the Eastern District of Pennsylvania and elsewhere, defendant

SUSANTA TEDJO

knowingly conducted, controlled, managed, supervised, directed, and owned part or all of an unlicensed money transmitting business, which was located at Srikandi Market, 2100 South 9th Street, Philadelphia, affecting interstate and foreign commerce, that is, defendant SUSANTA TEDJO operated and directed a money transmitting business, transmitting for fees in excess of \$17,500, approximately 717 wire transfers for over \$500,000, from her account at Commerce Bank in Philadelphia to her son D.T.'s account at HSBC Bank in Indonesia without obtaining a license from the Commonwealth of Pennsylvania to operate such a business, which was punishable under Pennsylvania Consolidated Statutes, Chapter 7, Section 6116.

In violation of Title 18, United States Code, Section 1960(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section
 1960(a), as charged in this indictment, defendant

SUSANTA TEDJO

shall forfeit to the United States any and all property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to a sum of money equal to \$509,126 in United States Currency.

- 2. If any of the forfeitable property, as describe above, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or
 - (d) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

In violation of Title 18, United States Code, Section 982 (a)(1).

	A TRUE BILL:
	GRAND JURY FOREPERSON
PATRICK L. MEEHAN UNITED STATES ATTORNEY	